

1 Michael R. Lozeau (State Bar No. 142893)
2 Douglas J. Chermak (State Bar No. 233382)
3 E-mail: michael@lozeaudrury.com
doug@lozeaudrury.com

4 LOZEAU DRURY LLP
5 410 12th Street, Suite 250
6 Oakland, CA 94607
7 Tel: (510) 836-4200
Fax: (510) 836-4205 (fax)

8 Attorneys for Plaintiff
9 LOS ANGELES WATERKEEPER

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 LOS ANGELES WATERKEEPER, a
13 non-profit corporation,

14 Plaintiff,

15
16 vs.

17 USA WASTE OF CALIFORNIA,
18 INC., a corporation,
19 Defendant.

Case No. 2:17-cv-01646-CAS-KS

REQUEST FOR ENTRY OF CONSENT
DECREE

Honorable Judge Christina A. Snyder

20 On November 9, 2017, the Court issued an Order pursuant to the parties'
21 stipulation staying this case until December 18, 2017, in order to allow sufficient time
22 for the United States Department of Justice and the United States Environmental
23 Protection Agency their mandated 45-days to review the [Proposed] Consent Decree
24 entered into by the parties on October 23, 2017. *See* 33 U.S.C. § 1365(c); 40 C.F.R. §
25 135.5. On December 18, 2017, the Department of Justice filed a letter with the Court
26 indicating that the federal agencies had no objection to entry of the [Proposed]
27 Consent Decree. Accordingly, the Parties hereby respectfully request that the Court
28

1 enter the [Proposed] Consent Decree filed with the Court contemporaneously with
2 this request.

3
4 Respectfully submitted,

5
6 Dated: December 18, 2017

LOZEAU DRURY LLP

7
8 /s/ Douglas J. Chermak

Douglas J. Chermak

9 Attorneys for Plaintiff LOS ANGELES
10 WATERKEEPER
11

12 Dated: December 18, 2017

BICK LAW LLP

13
14 /s/ Alan Bick

(as authorized on 12/18/17)

15 Alan Bick

16 Attorneys for Defendant USA WASTE OF
17 CALIFORNIA, INC.
18
19
20
21
22
23
24
25
26
27
28